



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-2670B
Plant ID No.:	071-00001
Applicant:	Greer Lime Company
Facility Name:	Riverton Facility
Location:	Pendleton County
NAICS Code:	32741
Application Type:	Modification
Received Date:	October 1, 2013
Engineer Assigned:	Steven R. Pursley, PE
Fee Amount:	\$2,000.00
Date Received:	October 3, 2013
Complete Date:	December 2, 2013
Due Date:	February 28, 2013
Applicant Ad Date:	October 3, 2013
Newspaper:	<i>The Pendleton Times</i>
UTM's:	Easting: 639.519 km Northing: 4,293.455 km Zone: 17
Description:	Addition of two coal stockpiles.

DESCRIPTION OF PROCESS

Greer Lime Company (Greer) proposes to add two (2) coal stockpiles to the facility. The purpose of the stockpiles is to provide an inventory of coal at the site in case of delivery issues (bad weather, etc.) that may occur. Coal stockpile 5-CS-1A and quarry area coal stockpile 5-CS-2 will have up to 15,000 tons on the ground with no more than 15,000 tons per year of annual throughput combined. Stockpile 5-CS-1A is located adjacent to the existing covered storage 5-CS-1 and will utilize exiting transfer points TP114A (truck dumping) and TP306 (endloader to bin). Stockpile 5-CS-2 is at a remote location in the rock quarry near the existing portable plant. Trucks will deliver coal to 5-CS-2 (TPC1). Endloaders will transfer (TPC2) coal from 5-CS-2 to trucks for transport to the county road. The coal will be delivered to the existing covered storage pile 5-CS-1.

The existing permit allow 5,000 tons of coal in storage and 54,000 tpy of throughput for coal stockpile 5-CS-1. The proposed stockpiles will allow for an additional 15,000 tons in storage and 15,000 tpy of additional coal deliveries. There is no change proposed for the allowable 54,000 tpy of coal processed and sent to the kilns.

SITE INSPECTION

A full on site inspection of the existing facility was performed by Karl Dettinger of the DAQ Eastern Panhandle Regional Office on July 24, 2013. The facility was found to be in compliance. Directions to the facility from Charleston: Take I79 north to exit 99. Turn right (east) on US Route 33 and proceed approximately 76.1 miles. Turn left on Germany Valley Limestone Road and proceed just over a mile to the facility.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

All transfer point, wind erosion of stockpiles and vehicular traffic emission calculations were based on Chapter 13 of AP-42. A control efficiency of 70% was applied to haul road calculations due to use of a water truck. Controlled emissions from the modification should be as follows:

	PM		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Transfer Points	0.78	0.02	0.37	0.01	0.06	0.01
Stockpiles	1.16	5.10	0.55	2.43	0.08	0.36
Vehicle Traffic	33.20	0.83	9.80	0.25	0.98	0.02
Total	35.14	5.95	10.72	2.69	1.12	0.39

REGULATORY APPLICABILITY

WV STATE RULES

45CSR5 To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants and Coal Handling Operations.

The facility is subject to §45-5-3.4. The facility will show compliance with the rule by conducting Method 22 and Method 9 testing per the current permit.

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45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation.

The modification is subject to 45CSR13 because the modification is subject to 40CFR60 Subpart Y. As required under §45-13-8.3 ("Notice Level A"), Greer placed a Class I legal advertisement in a "newspaper of general circulation in the area where the source is . . . located." The ad ran on October 3, 2013 in The Pendleton Times and the affidavit of publication for this legal advertisement was submitted on November 06, 2013.

45CSR30 Requirements of Operating Permits.

The facility is an existing Title V major source with an existing Title V permit (R30-07100001-2009). Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

FEDERAL REGULATIONS

40CFR60 Subpart Y Standards of Performance for Coal Preparation Plants

This facility is subject because it was constructed after October 24, 1974 and processes more than 200 tons of coal per day. The proposed modification will include two (2) stockpiles. The facility should be in compliance with Section 254(b) (less than 10% opacity for coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal) when the particulate matter control methods and devices proposed are in operation. Again, the facility shall show compliance with visible emission standard by performing Method 9 tests in accordance with the rule and the existing permit.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

No non-criteria regulated pollutants are expected to be emitted as a result of this modification.

AIR QUALITY IMPACT ANALYSIS

Because this is a minor modification to an existing major source, no modeling was performed.

MONITORING OF OPERATIONS

In addition to the monitoring already required by R13-2670A, the permittee shall monitor and record the following:

- * The amount of coal loaded into 5-CS-1A
- * The amount of coal loaded into 5-CS-2

CHANGES TO PERMIT R13-2670A

The following changes were made to R13-2670A:

- * The permit was put into the most recent boilerplate.
- * Condition 4.1.1 was changed to clarify that the limit applies to coal sent to the kiln.
- * Condition 4.1.4 was changed to reflect the updated Subpart Y language (and rule citation).
- * New condition 4.1.5 was added.
- * Old condition 4.1.5 was renumbered to 4.1.6.
- * Condition 4.2.1 was changed to clarify that the requirement applies to coal sent to the kiln.
- * New condition 4.2.4 was added.
- * Section 4.2 was renumbered to correct a numbering mistake in the original permit.

RECOMMENDATION TO DIRECTOR

Information supplied in the application indicates that compliance with all applicable regulations will be achieved. Therefore it is the recommendation of the writer that permit R13-2670B for the modification of the Riverton Facility located near Riverton, Pendleton County, be granted to Greer Lime Company.

Steven R. Pursley, PE
Engineer

March 4, 2014

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